

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ROBIN STEPHENS,

Plaintiff,

Case No. 07-CV-5614-VM

-against-

**SHUTTLE ASSOCIATES, LLC,
SUPERSHUTTLE INTERNATIONAL, INC.,
NEW YORK CITY TRANSIT AUTHORITY,
MANHATTAN AND BRONX SURFACE
TRANSIT OPERATING AUTHORITY and
“JOHN DOE,” NYCT BUS DRIVER**

**CONSENT MOTION TO
ESTABLISH DEADLINE TO
RESPOND TO COMPLAINT**

Defendants.

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Defendant Shuttle Associates, LLC hereby moves to establish the deadline for it to respond to Plaintiff's Complaint in this matter to August 13, 2007. In support of this motion, Shuttle Associates state as follows:

1. This is the first extension Shuttle Associates has sought to respond to the Complaint and Plaintiff Robin Stephens consents to this request.

2. If granted, this extension would not affect any other scheduled dates in this matter.

3. As part of agreement allowing Shuttle Associates to establish a deadline with the Plaintiff's consent, Shuttle Associates agreed to accept service of the Complaint, which service had not yet been completed. Because service of the Complaint on Shuttle Associates had not been completed prior to that agreement, there was no deadline for Shuttle Associates to respond to the Complaint prior to the parties' agreement to seek approval for the August 13, 2007 deadline.

4. Shuttle Associates did not receive a copy of the Amended Complaint naming it as a defendant in this action, which includes at least six counts against Shuttle Associates, until June 20, 2007. Each of the counts against Shuttle Associates is grounded in a different statute or common law theory of liability. Given the complexity of the claims against Shuttle Associates, Shuttle Associates will need until August 13 to prepare its response to the Complaint.

5. This motion is made for valid reasons and is not interposed for purposes of delay.

6. The Plaintiff consents to this motion.

Dated: Washington, D.C.
June 22, 2007

By s/Thomas Earl Patton
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